

EXHIBIT R

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

CONNECTU LLC,

Plaintiff,

v.

MARK ZUCKERBERG, EDUARDO SAVERIN,
DUSTIN MOSKOVITZ, ANDREW MCCOLLUM,
CHRISTOPHER HUGHES, and THEFACEBOOK,
INC.,

Defendants.

MARK ZUCKERBERG, and
THEFACEBOOK, INC.,
Counterclaimants,

v.

CONNECTU LLC,

Counterdefendant,

and

CAMERON WINKLEVOSS, TYLER
WINKLEVOSS, and DIVYA NARENDRA,

Additional Counterdefendants.

CIVIL ACTION NO. 1:04-cv-11923
(DPW)

**PLAINTIFF AND COUNTERCLAIM DEFENDANTS'
INITIAL DISCLOSURES PURSUANT TO FED. R. CIV. P. 26(a)**

Pursuant to Rule 26(a) of the Federal Rules of Civil Procedure, Plaintiff ConnectU LLC and Counterclaim Defendants ConnectU LLC, Cameron Winklevoss, Tyler Winklevoss, and Divya Narendra (collectively, solely for purposes of this disclosure, "ConnectU") make the following Initial Disclosures to Defendants Mark Zuckerberg, Eduardo Saverin, Dustin

Moskovitz, Andrew McCollum, Christopher Hughes, and TheFaceBook, Inc., and Counterclaim Plaintiffs Mark Zuckerberg and TheFaceBook, Inc. (collectively, "TheFaceBook").

These Initial Disclosures are preliminary in nature. To the best of ConnectU's knowledge, information, and belief, formed after reasonable inquiry, the disclosures are complete and correct as of the time they are made. ConnectU reserves the right to amend and/or supplement these disclosures as pertinent facts become known in the future, as contemplated by Federal Rule of Civil Procedure 26(e).

By specifying that certain documents are located in the offices of ConnectU's counsel, ConnectU does not waive attorney-client privilege or work product immunity with respect to any such documents or the subject matter thereof.

A. 26(a)(1)(A): Witnesses

At present, ConnectU has identified the following persons as persons who may have discoverable information that ConnectU may use to support its Complaint and defend against the counterclaims. ConnectU reserves the right to amend this list.

NAME/ADDRESS	TITLE	SUBJECT MATTER
Cameron Winklevoss 10 Khakum Wood Rd. Greenwich, CT 06831	Founder, ConnectU LLC	All subjects relevant to Complaint and Counterclaims
Tyler Winklevoss 10 Khakum Wood Rd. Greenwich, CT 06831	Founder, ConnectU LLC	All subjects relevant to Complaint and Counterclaims
Divya Narendra 16 Park Avenue New York, NY 10016	Founder, ConnectU LLC	All subjects relevant to Complaint and Counterclaims
Victor Gao 927 N. Sycamore Street Arlington, VA 22207	Software Programmer	Development of the Harvard Connection website and software
Sanjay Mavinkurve 916 Oakes Street Palo Alto, CA 94303	Software Programmer	Development of the Harvard Connection website and software

Joseph Jackson Harvard University Pforzheimer House 56 Linnaean Street Cambridge, MA 02138	Software Programmer	Harvard Connection Software
Lawrence H. Summers Massachusetts Hall Cambridge, MA 02138	President, Harvard University	Mr. Summer's consideration of the dispute between the parties
John T. O'Keefe Massachusetts Hall Cambridge, MA 02138	Assistant Dean and Secretary, Harvard Administrative Board	Harvard Administrative Board's consideration of the dispute between the parties
Melinda Gray Current Address Unknown	House Tutor, Harvard University	Harvard Administrative Board's consideration of the dispute between the parties
Timothy J. McGinn The Harvard Crimson 14 Plympton Street Cambridge, MA 02138	Staff Writer, Harvard Crimson	Comments by the parties to the press
Shirin Sharie The Stanford Daily Storke Publications Bldg., Suite 101 Stanford, CA 94305	Desk Editor, The Stanford Daily	Comments by the parties to the press
Marcella Bombardieri The Boston Globe 135 Morrissey Blvd. Boston, MA 02125	Staff Writer, The Boston Globe	Comments by the parties to the press
Kevin J. Feeney The Harvard Crimson 14 Plympton Street Cambridge, MA 02138	Staff Writer, Harvard Crimson	Comments by the parties to the press
Sean Parker c/o TheFaceBook, Inc. 471 Emerson Street Palo Alto, CA	Unknown	Development and funding of thefacebook.com
Adam D'Angelo California Institute of Technology Lloyd House Pasadena, CA 91126	Unknown	Development and funding of thefacebook.com
Jonathan Abrams c/o Friendster, Inc. 1380 Villa Street Mountain View, CA 94041	Unknown	Development and funding of thefacebook.com

Marc Pierrat iMarc LLC 14 Inn Street Newburyport, MA 01950	Director of Marketing and Business Development	Software development for connectu.com
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B. 26(a)(1)(B): Documents

At present, ConnectU has identified the following documents, data compilations, and tangible things that are in ConnectU's possession, custody, or control that ConnectU may use to support its claims. ConnectU reserves the right to amend this list.

DESCRIPTION OF DOCUMENTS	LOCATION
Documents relating to the creation and development of the Harvard Connection and ConnectU business plan(s)	On the business premises of ConnectU LLC At the home of Cameron Winklevoss At the home of Tyler Winklevoss At the home of Divya Narendra Finnegan Henderson et al. Washington, DC
Documents relating to the creation and development of the Harvard Connection and ConnectU software and website	On the business premises of ConnectU LLC At the home of Cameron Winklevoss At the home of Tyler Winklevoss At the home of Divya Narendra At the home of Victor Gao Finnegan Henderson et al. Washington, DC
Documents relating to the Copyright Registration for the work entitled Harvard Connection Code (Reg. No. TXu-196-126)	On the business premises of ConnectU LLC Finnegan Henderson et al. Washington, DC

Documents relating to the business relationship between ConnectU and TheFaceBook	<p>On the business premises of ConnectU LLC</p> <p>At the home of Cameron Winklevoss</p> <p>At the home of Tyler Winklevoss</p> <p>At the home of Divya Narendra</p> <p>At the home of Victor Gao</p> <p>Finnegan Henderson et al. Washington, DC</p>
Documents relating to the business, operations, and marketing of ConnectU LLC	<p>On the business premises of ConnectU LLC</p> <p>At the home of Cameron Winklevoss</p> <p>At the home of Tyler Winklevoss</p> <p>At the home of Divya Narendra</p> <p>Finnegan Henderson et al. Washington, DC</p>
Media coverage of TheFaceBook.com, ConnectU.com, and the dispute between the parties	<p>On the business premises of ConnectU LLC</p> <p>At the home of Cameron Winklevoss</p> <p>At the home of Tyler Winklevoss</p> <p>At the home of Divya Narendra</p> <p>Finnegan Henderson et al. Washington, DC</p>
Documents relating to the parties' proceedings before the Harvard Administrative Board	<p>On the business premises of ConnectU LLC</p> <p>At the home of Cameron Winklevoss</p> <p>At the home of Tyler Winklevoss</p> <p>At the home of Divya Narendra</p> <p>Harvard University</p> <p>Finnegan Henderson et al. Washington, DC</p>

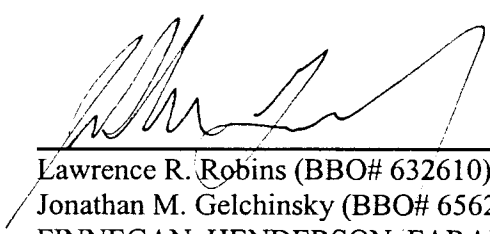
C. 26(a)(1)(C) Calculation of Damages

ConnectU cannot calculate its damages prior to obtaining discovery materials from TheFaceBook and obtaining expert opinions regarding the value of TheFaceBook, Inc.

D. 26(a)(1)(D): Insurance

ConnectU is not aware of any applicable insurance policies at this time.

DATED this 7th day of April, 2005



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CERTIFICATE OF SERVICE

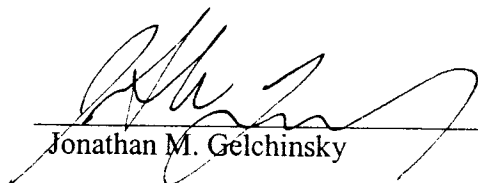
I, Jonathan M. Gelchinsky, hereby certify that on April 7, 2005, a true and correct copy of the foregoing PLAINTIFF AND COUNTERCLAIM DEFENDANTS' INITIAL DISCLOSURES PURSUANT TO FED. R. CIV. P. 26(a) was served by the indicated means to the persons at the addresses listed:

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- ☐ Via First Class Mail
- ☒ Via Hand Delivery
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